

EXHIBIT B

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UNITED STATES DISTRICT COURT
Southern DISTRICT OF NEW JERSEY YORK

MICHAEL S. JOHNSON, DONNA:
DYMKOWSKI, PATRICIA LONG-:
CORREA, ANTONIO SAMUEL, VINCENT:
HALL, ANGELETTE WATERS,:
Individually, and on behalf of the Class,

Plaintiffs,

vs.

NEXTEL COMMUNICATIONS, INC., a:
Delaware Corporation; LEEDS, MORELLI &:
BROWN, P.C.; LENARD LEEDS, STEVEN:
A. MORELLI, JEFFREY K. BROWN,:
JAMES VAGNINI; FREDERIC DAVID:
OSTROVE; BRYAN MAZOLLA; SUSAN:
FITZGERALD; AND JOHN AND JANE:
DOES 1-10 (a fictitious designation for:
presently unknown Defendants),

Defendants.

: CIVIL ACTION NO. 06-5547 (DMC) (MF)
:
: CERTIFICATION OF
: KENNETH S. THYNE

I, Kenneth S. Thyne, of full age, by way of certification in lieu of oath state:

1. I make this Certification in opposition to Defendants' Motions to Change Venue and to

Dismiss. I attach hereto as Exhibits A and B two documents that were filed by attorneys for Defendants, Leeds, Morelli & Brown, in Courts in Colorado. I attach only certain pages from these documents, as they were apparently subject to a Protective Order, and I have redacted the documents to reveal only the information directly pertinent to the Motions pending before the Court.

2. Attached hereto as Exhibit A is a schedule submitted by Leeds, Morelli & Brown's attorney in litigation in Colorado setting forth the state of residence of the members of the 588 members of the class. As can be seen from this schedule, only 9 members of the class are from New York; 99 come from New Jersey. It is difficult to reconcile the representations Leeds, Morelli & Brown made in this chart, which they submitted to the Court in Colorado with certain statements made in their Brief in support of their Motion to Change Venue.

3. Attached hereto as Exhibit B is an excerpt from a brief filed by Leeds, Morelli & Brown in an action in Colorado, captioned McNeil v. Leeds, Morelli & Brown, Case No. 03CV893. While the pages are marked as "under seal," it is my understanding that the action is not under seal. Nevertheless, I attach Page 5 from a brief Leeds, Morelli & Brown filed in the case. Again, the statement as to Leeds, Morelli & Brown's involvement with the members of the class in this matter appear to be at odds with the facts they are asserting in support of their Motion to Change Venue.

4. By redacting these exhibits, Plaintiffs do not in any way agree that any of these documents are under seal or subject to a Protective Order, or that Plaintiffs are in any way limited in using same. They simply do so for the Court's information.

5. Attached hereto as Exhibit C is Amendment One to the Dispute Resolution and Settlement Agreement dated September 28, 2000.

6. Attached hereto as Exhibit D is Amendment Two to the to the Dispute Resolution and Settlement Agreement. This Amendment is dated February 8, 2001.

7. Attached hereto as Exhibit E is Amendment Three to the Dispute Resolution and Settlement Agreement. This Amendment is dated September 14, 2001.

8. Attached hereto as Exhibit F is the Highlights to the settlement agreement with Nextel.

9. Attached hereto as Exhibit G are various newspaper articles indicating, among other things, that Leeds, Morelli & Brown were claiming 1.76 million dollars in damages in discrimination suit or asking for a settlement by Defendant Brown to be 2 million dollars or more.

10. Attached hereto as Exhibit H is the Fourth Amended Complaint in the matter of McNeil v. Leeds Morelli & Brown, Nextel, et al.

11. Attached hereto as Exhibit I is Defendant Nextel's Motion to Dismiss in McNeil.

12. Attached hereto as Exhibit J is the Order of the District Court Judge John McMullen denying, for the most part, Defendant Nextel's Motion to Dismiss in McNeil.

13. Attached hereto as Exhibit K is Defendant Leeds, Morelli & Brown's Motion to Dismiss in McNeil.

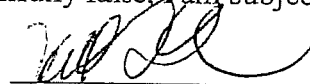
14. Attached hereto as Exhibit L is the Order of the District Court Judge John McMullen dated January 5, 2007.

15. Attached hereto as Exhibit M is the Affidavit of Lutchman Boodoo, wherein Mr. Boodoo indicates that he had never seen the DRSA and was unaware of the multi-million dollar payment of legal fees from Nextel to Leeds-Morelli, which bore no relationship to the amount they recovered on the client's behalf. I have seen more than 50 similar affidavits.

16. Attached hereto as Exhibit N the First Amended Complaint in this matter.

17. Attached hereto as Exhibit O the decision In the matter of Karrel Zaruba, Supreme Court of New Jersey, DRB 03-098.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Kenneth S. Thyne
Attorney for Plaintiffs

Dated:

1/23/07